

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

TREVOR WILLIAMS,	§	
	§	
Plaintiff/Intervenor Defendant	§	
	§	
vs.	§	
	§	
REMINGTON ARMS COMPANY, INC.	§	Civil Action No. 3:05-CV-1383-D
	§	(ECF) (CLOSED CASE)
Defendant.	§	
	§	
and	§	
	§	
TURLEY LAW FIRM	§	
	§	
Intervenor Plaintiff	§	

**INTERVENOR DEFENDANT TREVOR WILLIAMS' OFFER OF JUDGMENT TO
TURLEY LAW FIRM**

TO THE HONORABLE UNITED STATES DISTRICT COURT:

COMES NOW, Intervenor/Defendant Trevor Williams (Williams) and makes the following offer of judgment to Intervenor/Plaintiff Turley Law Firm (TLF) pursuant to Rule 68 F.R.C.P.:

1. Responding to TLF's demand for 30% of the \$570,000 total fee (\$171,000), Williams offers that a judgment may be entered against him for the sum of \$100,000 (17.54%). This offer is not revocable for 10 days, after which time it is withdrawn.
2. The offer of judgment also provides for costs now accrued in the prosecution of this breach of contract action, but the offer is inclusive of attorney fees for

- prosecution of this breach of contract action. Any and all attorneys fees accrued are part of the total sum for which judgment may be entered.
3. If TLF does not accept the offer and then receives a judgment less favorable than \$100,000, the TLF must pay to Mr. Williams and his attorneys any costs incurred after this offer was made. *See* FRCP 68.

Respectfully submitted,

s/ Jeffrey W. Hightower, Jr.
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

On July 31, 2008, this offer of judgment was served by E-mail through the ECF system.

s/ Jeffrey W. Hightower, Jr.
Jeffrey W. Hightower, Jr.